IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

FILED

UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

JAN 3 0 2007

UNITED STATES OF AMERICA,

    Plaintiff,

vs.

MATTHEW J. DYKMAN
CLERK

Criminal No. 06–1165 JB

TYRONE LARGO,

    Defendant.

UNITED STATES' MOTION FOR DOWNWARD ADJUSTMENT IN DEFENDANT'S OFFENSE LEVEL

COMES NOW the United States of America, by and through David C. Iglesias, United States Attorney for the District of New Mexico, and Samuel L. Winder, Assistant United States Attorney for said district files this motion pursuant to U.S.S.G § 3E 1.1(b), and moves the Court for an order for a one (1) level downward adjustment of the Offense Level in sentencing the above-named Defendant. As grounds the United States provides as follows:

1.   Pursuant to U.S.S.G. § 3E1.1(a), the Defendant clearly has demonstrated acceptance of responsibility for this offense, and the defendant's offense should be decreased by two (2) levels.

2.   Prior to operation of U.S.S.G.§3E1.1(b), the Defendant's offense level is sixteen (16) or greater.

3.   The Defendant has assisted the authorities in the investigation or prosecution of this matter by timely notifying authorities of the Defendant's intention to enter a plea of guilty, thereby permitting the Government to avoid preparing for trial and permitting the Government and the Court to allocate their resources efficiently.

4.   Therefore, pursuant to U.S.S.G. §3E1.1(b), the Defendant's offense level should be adjusted downward by one (1) additional level.

WHEREFORE, the United States respectfully requests a downward adjustment in the Defendant's offense level of one (1) additional level for acceptance of responsibility.

Respectfully submitted,

DAVID C. IGLESIAS
United States Attorney

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I HEREBY CERTIFY that a true
copy of the foregoing was hand-delivered to
counsel for the Defendant on the
30th day of January, 2007

Samuel L. Winder
Assistant United States Attorney